

RCRA Subtitle C Compliance Evaluation Inspection

Formerly American Plating Company, Inc.  
4004 East Monument Street  
Baltimore, MD 21205

County: City of Baltimore

**RCRA Identification Number: MDD054909072**

**Date of Inspection: May 26, 2015 & June 2, 2015**

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Andrew Ma  
June 18, 2015

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## **1.0 Background**

On May 26, 2015 & June 2, 2015, the United States Environmental Protection Agency, Region III (“EPA”), Land and Chemicals Division, Office of Land Enforcement conducted an unannounced Compliance Evaluation Inspection (“CEI”) under the Resource Conservation and Recovery Act (“RCRA”), as amended, 42 U.S.C. Sections 6901 et seq., of the property located at 4004 E. Monument Street, Baltimore, MD (herein after referred to as “the Facility”). The U.S. EPA was represented by Mr. Andrew Ma. The Maryland Department of the Environment was represented by Mr. Coblentz who was present during the May 26, 2015 inspection, and Mr. Leizear was present during both days of inspection. The Facility was represented by Mr. Arthur Nagy, who has been at the Facility for less than 4 weeks.

The inspection team arrived to the Facility at 8:40 AM on May 26, 2015 in response to a tip and complaint received by the MDE regarding abandoned containers at a facility located at 603 Dundalk Avenue in Baltimore, MD. MDE notified EPA when they learned that the containers were moved to the Facility located on E. Monument Street. The windows to the Facility were boarded up, and the front gate to the parking lot was locked. The inspection team walked next door to Geotze’s Candy Company, Inc., and spoke with Mr. Mitchell Goetze (President & Chief Operating Officer). Mr. Goetze indicated that the previous occupants, American Plating, moved a couple months ago to a Facility in White Marsh, MD. The EPA inspector took pictures of the rear of the Facility from the Geotze’s Candy Company, Inc. property. Please refer to Photo #1 and Photo #2 of the Photographic Log included as Attachment A.

Upon returning to the front gate of the Facility, the inspectors observed two individuals inside the locked gate that identified themselves as employees of Mr. Nagy. The EPA inspector requested access to the Facility to perform the hazardous waste inspection. One individual, identified himself as Steve, stated that they are not authorized to give anyone access to the Facility, and they were unsure if Mr. Nagy will be available to give access for the inspection today. Steve indicated that they do not do any electroplating at the Facility, but only fabricate plating lines and sell electroplating raw materials. Steve also stated that American Plating left plating materials at the Facility.

The EPA inspector called Mr. Dave Naumann, the former owner of American Plating, which operated an electroplating company from the Facility, and requested access to conduct the EPA inspection. Mr. Naumann stated that he no longer operates from the Facility, and he had been “kicked out.” He also indicated that another company currently leases the Facility, and he provided the EPA inspector with Mr. Nagy’s phone number. Upon returning to the office, the EPA inspector contacted Mr. Nagy, and scheduled to meet Mr. Nagy to conduct the hazardous waste inspection at the Facility on June 2, 2015 at 8:30 AM.

On June 2, 2015 the EPA inspector and Mr. Leizear returned to the Facility to conduct the CEI. The inspectors were met by Mr. Nagy at the front gate, and entered through the shipping and receiving area of the Facility to conduct the opening conference. Mr. Ma explained

the purpose of the RCRA Subtitle C inspection to be conducted at the Facility. Mr. Ma presented his credentials to Mr. Nagy at the time of the inspection.

All information included in this report are the results of statements made by the Facility representatives, materials shown to the inspectors by the Facility representatives during the inspection, and information and documents provided by the Facility representatives to EPA during and after the inspection.

## **2.0 General Facility Information**

Mr. Nagy has been operating from the Facility for about 4 weeks. He operates a plating line fabrication, and plating raw material chemical sales business, and he moved his inventory to the Facility from a different facility located at 603 Dundalk Avenue in Baltimore, MD. Mr. Nagy does not have a name for his current company, but his last company, Plating and Anodizing, is no longer in existence. It is Mr. Nagy's understanding that the Facility is owned by a company named Monument Street Properties. He also stated that American Plating previously operated an electroplating shop from the Facility. Mr. Nagy stated that he paid a deposit to Mr. Naumann, the owner of American Plating, in order to operate his business from the Facility, but he does not have a formal lease agreement or contract with Mr. Naumann. As part of the agreement with Mr. Naumann, Mr. Nagy stated he has access to use the plating equipment onsite, he will get rid of any wastewater left in the onsite wastewater treatment unit ("WWTU"), and he will also resell useable plating solutions and raw materials left by American Plating. Mr. Nagy has 4 employees, 2 are full-time and 2 are part-time. He worked for American Plating from 1988 to 1990, and then again from 2004 to 2006.

According to Mr. Nagy, American Plating left an intact cadmium hoist plating line, zinc hoist plating line, and anodizing lines. Mr. Nagy also indicated that the WWTU is still intact and functioning, but he has not used it since moving into the Facility. At the time of the CEI, the WWTU had one tank partially filled with sludge, and a container of WWTU sludge was also left by American Plating. He also indicated that the WWTU pit that collected all the plating rinse water, while American Plating was still in operation, was completely filled from the overnight rain that leaked through the roof of the Facility.

At the time of the inspection, Mr. Nagy indicated that he currently had the following inventory of the chemicals stored onsite, which he had transported from the 603 Dundalk Avenue facility: borax based cleaners, cleaner/etching sodium hydroxide, electro-cleaners, sulfuric acid, hydrochloric acid, and nitric acid. These materials are stored near the former chrome department.

Mr. Nagy indicated that the majority of plating materials left by American Plating are stored near the former Automatic Zinc Line. He has not inventoried everything that the company had left, but he thought there might be 15 to 20 drums of unused material that consisted of the following: hydrochloric acid, sodium hydroxide, industrial bleach, copper in solid form, nickel in solid form, sulfuric acid, hydrochloric acid, hexavalent chrome, and trivalent chrome.

### **3.0 Inspection Observations**

The tour of the Facility began at 9:05 AM, and the inspectors were accompanied by Mr. Nagy.

#### **3.1 Anodize Department**

In this area of the Facility, the EPA inspector observed several tanks along the anodizing line that was not operational at the time of the inspection (Photo #3 – Photo #5). The EPA inspector was unable to inspect each of the tanks in this area of the Facility, because some of the tanks were not accessible. One of the tanks that formerly contained sodium hydride and sulfuric acid had formed solid sulfur crystals.

#### **3.2 Automatic Zinc Department**

On the way to the former location of the Automatic Zinc Department the EPA inspector observed plastic plating lines and plating tanks that were fabricated by Mr. Nagy (Photo #6 & Photo #7).

Several containers of chemicals were observed to be stored in this area of the Facility (Photo #8 – Photo #13). According to Mr. Nagy, he will try to resell any of the useable product in this area of the Facility, and he indicated that about 25 or so of the containers in this area were left by American Plating. The EPA inspector was unable to access and inspect every container, because the area was dimly lit, and there was debris next to the containers.

#### **3.3 Zinc Hoist & Cadmium Hoist Department**

Mr. Nagy indicated that the process tanks in this area of the Facility are still intact. At the time of the inspection, this area was not in operation. The EPA inspector observed a partially filled tank that contained zinc-chloride solution (Photo #14). The tank was covered with a plastic tarp, and Mr. Nagy indicated that he was planning on selling the contents of the tank, which was left by American Plating. Also in this area was an open tank that was partially filled with electro cleaner, which was used by American Plating to clean parts (Photo #15). Mr. Nagy indicated that he plans to continue to use this tank for cleaning parts, which mainly consists of caustic soda solution. A partially filled cadmium oxide plating tank was also observed in this area of the Facility, and Mr. Nagy indicated that he plans on reselling the contents of the tank (Photo #16).

#### **3.4 Zinc Barrel Line**

Near the zinc hoist and cadmium hoist lines, the EPA inspector observed the area where the zinc barrel line was formerly located (Photo #17 & Photo #18). Next to this area of the Facility, the EPA inspector observed liquid accumulated on the floor of the Facility. Mr. Nagy indicated that the water accumulated on the floor was due to a leak in the roof of the Facility, and

the leak occurred the night before the EPA CEI from heavy rain. Also stacked near the former Zinc Barrel Line were empty tanks, which were previously used as process tanks.

### **3.5 Electropolishing Department**

Several full containers of unused materials were located in this area of the Facility (Photo #19 –Photo #25). Each container was labeled with a product label and closed. The EPA inspector observed two stacked pallets of 55-gallon containers in this area. The closed containers were labeled as “enthone,” and the EPA inspector observed that two of the containers had expiration dates of 3/6/9 and 6/22/10. Also in this area the EPA inspector observed two stacked pallets of shrink-wrapped containers that were closed and labeled with product labels. The EPA inspector was unable to read each label, but some of the containers were labeled as “non-hazardous material” and had expiration dates of 6/19/09. Mr. Nagy indicated that he was planning on selling the containers in this area of the Facility.

### **3.6 Wastewater Treatment Unit**

In this area of the Facility, the EPA inspector observed the sludge tank and the filter press affiliated with the onsite WWTU (Photo #26). The EPA inspector was unable access the sludge tank in order to inspect it, and Mr. Nagy indicated that the tank was partially filled with WWTU sludge that was left by American Plating. At the time of the inspection, the WWTU was not in operation. Mr. Nagy indicated that the WWTU was still functional, and the wastewater treatment permit was due to expire sometime in June, 2015. An open container of WWTU sludge was observed in this area of the Facility (Photo #27 – Photo #29). The container was labeled with the words “Hazardous Waste”, dated as 1/6/15, and it was partially filled with waste generated from the WWTU filter press. Mr. Nagy indicated that he was planning on contacting Safety-Kleen to remove and dispose of the WWTU sludge. The EPA inspector then walked to the WWTU “pit” (Photo #30), which was previously used to collect all rinse water from electroplating processes that were formerly run by American Plating. At the time of the inspection, the pit was filled with liquid. Mr. Nagy indicated that the pit was filled with water that leaked through the roof of the Facility.

Before inspecting the rest of the WWTU, the inspectors observed the former chrome plating department (Photo #31 & Photo #32). Mr. Nagy used this area to accumulate containers of plating materials that he transported from his 603 Dundalk Avenue facility, and he indicated that he plans on selling all the material in this area as product. Some of the containers were observed to be accumulated on pallets and shrink-wrapped. The EPA inspector observed liquid accumulated on the floor in this area of the Facility.

Returning to the WWTU area, the EPA inspector observed WWTU process tanks (Photo #33 – Photo #34). According to Mr. Nagy, the green tank, as seen in Photo #33 & #34 was partially filled with industrial grade bleach. At the time of the inspection, the secondary containment around the WWTU process tanks was filled with an unknown liquid. Per Mr. Nagy, some of the WWTU tanks were empty at the time of the inspection (Photo #35). The EPA

inspector also observed the sodium hydroxide tank in the WWTU area, which was open and labeled with the words “Sodium Hydroxide” and “UN1824” (Photo #36). At the time of the inspection, the EPA inspector observed sodium hydroxide that had solidified and accumulated near the top of the tank.

### **3.7 Electroless Nickel Area**

This area of the Facility had process tanks that were previously used for the electroless nickel plating process. The EPA inspector observed a former process tank that was partially filled with an unknown liquid (Photo #37). The EPA inspector observed another tank in this area of the Facility that was filled with an unknown liquid (Photo #38 – Photo #40). Near the former process tanks, the EPA inspector observed a black substance accumulated on piping (Photo #41). According to Mr. Nagy, the black masking material may have been used to prevent a leak from the piping. Liquid was observed to be accumulated on the floor in this area of the Facility.

Also in this area of the Facility, the EPA inspector observed two blue 55-gallon containers (Photo #42 & Photo #43). One of the containers was labeled as “Hydrochloric Acid” and with the word “corrosive.” According to Mr. Nagy, both containers were partially filled with tin plating solution, which was left by American Plating. Near the 55-gallon containers was a container of hydrochloric acid (Photo #44). Mr. Nagy indicated the hydrochloric acid can be used to descale and remove rust from parts, and he is planning on either reusing or selling the container of hydrochloric acid. At the time of the inspection, the container was covered with a piece of plywood.

### **3.8 Masking Area**

Mr. Nagy indicated that he will use this area for packaging and shipping. The EPA inspector observed used lamps accumulated in this area of the Facility (Photo #45).

### **3.9 Outside-Rear of the Facility**

In the rear of the Facility, the EPA inspector observed rusted containers of propane, as well as other rusted containers labeled with the words “flammable” that were filled with an unknown substance (Photo #46 – Photo #48).

The inspector returned to the inside of the Facility to the Automatic Zinc Department. Mr. Nagy showed the inspectors one container of hexavalent chrome, and several containers of trivalent chrome (Photo #49 & Photo #50). Mr. Nagy stated that it would be difficult for him to resell the hexavalent chrome, and he will resell the trivalent chrome.

### **4.0 Records Review**

Prior to the EPA inspection, MDE requested an inventory list for each of the containers that Mr. Nagy transported from the 603 Dundalk Avenue facility. Mr. Nagy indicated he is

looking for his inventory list, and he will send this information to MDE when he locates it. He also indicated that he has previously purchased plating chemicals from the following entities: Seiler-Hughes Chemicals, Inc. in Baltimore, MD; North Industrial Chemicals, Inc. of York, PA, and Tilley Chemical of MD.

Mr. Nagy did not have an inventory list for any of the containers of materials that were left by American Plating in the Automatic Zinc Department, and he did not have an inventory list for containers that were left by American Plating in any other area of the Facility. Mr. Nagy indicated he was planning on assembling an evaporator system for any of the chemicals located in the Automatic Zinc Department that he could not reuse or resell. He also stated that he was planning on setting up a filtration system to filter out any contaminants in the plating line tanks left by American Plating, and resell the useable product after filtration.

## **5.0 Closing with Facility Representative**

At the conclusion of the CEI, the inspectors noted the following areas of concern during the inspection:

- The EPA inspector requested that Mr. Nagy catalogue and submit to MDE an inventory list of all the materials left onsite by American Plating and for all the materials that were transported from his 603 Dundalk Avenue facility;
- The EPA inspectors informed Mr. Nagy that he should not evaporate any of the onsite plating chemicals;
- One open container of listed hazardous (F006) WWTU sludge was observed in the WWTU area (Photo #27 – Photo #29). The container was dated with an accumulation start date of 1/6/15, which indicates it has been onsite for greater than 90 days.
- The WWTU sludge tank was partially filled with WWTU sludge, and the WWTU was not in use at the time of the CEI.

## **6.0 Attachment**

- A. Photographic Log